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*Attorney for Plaintiff*  
 SINCO TECHNOLOGIES PTE LTD

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

SINCO TECHNOLOGIES PTE LTD,

Plaintiff,

v.

SINCO ELECTRONICS (DONGGUAN) CO.,  
 LTD.; XINGKE ELECTRONICS  
 (DONGGUAN) CO., LTD.; XINGKE  
 ELECTRONICS TECHNOLOGY CO., LTD.;  
 SINCOO ELECTRONICS TECHNOLOGY  
 CO., LTD.; MUI LIANG TJOA (an  
 individual); NG CHER YONG aka CY NG (an  
 individual); and LIEW YEW SOON aka  
 MARK LIEW (an individual),

Defendants.

Case No. 3:17CV5517

**PLAINTIFF SINCO TECHNOLOGIES  
 PTE LTD'S *SHORTENED TRIAL*  
 DEPOSITION DESIGNATIONS  
 [TO SERVE AS A REPLACEMENT OF  
 ECF DOC NO. 477-6, APPENDIX D.1]**

PRETRIAL HEARING

Date: October 5, 2021

Time: 3:00 p.m.

Place: Courtroom 5 – 17<sup>th</sup> Floor

Hon. Edward M. Chen

TRIAL DATE

November 1, 2021

Plaintiff SinCo Technologies Pte. Ltd, hereby provides notice of intent to play the following portions of the shortened videotaped deposition or read the following portions of the deposition transcripts identified herein, at the **November 1, 2021** Jury Trial. Plaintiff shall or may call witnesses live at trial, specifically Miriam Paton, as disclosed and referenced at [ECF 84] and those witnesses set forth in SinCo Technologies Pte Ltd.'s Initial Disclosures of **April 10, 2019**, unless so designated herein. Plaintiff reserves the right to supplement these disclosures to the extent any witness so referenced is not available for trial and has herein been deposed in this matter. Plaintiff SinCo Technologies Pte. Ltd, has relied on the **August 24, 2021**, meet and confer

wherein it was represented that all named Defendants would be appearing in person for trial.

## JOINT LIST OF DEPOSITION DESIGNATIONS, COUNTER-DESIGNATIONS AND OBJECTIONS

These designations anticipate the removal of objections and interaction not in the form of a question by counsel as presented to the Jury.

### I. Quek Seow Eng (Singapore)

DEPOSITION OF QUEK SEOW ENG, TAKEN ON <b>MAY 28, 2019</b> (Page and Line Numbers)			
PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
9:8-9:21			
18:21-19:22			
20:24-21:22			
22:23-23:6			
42:3-43:11			
44:17-45:4			
45:15-45:23			
47:9-49:11			
54:1-54:24			
56:7-56:20			
62:6-64:22			
66:15 – 69:25			
70:2 -71:4			
71:17-73:7			
81:6-82:15			
82:21-83:2			
84:18-85:8			

DEPOSITION OF QUEK SEOW ENG, TAKEN ON **MAY 28, 2019**  
(Page and Line Numbers)

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
121:4-21			
133:9-134:6			
149:2-6			
152:3-20			

**II. JERRY YANG DARUI (Singapore Permanent Resident)**

DEPOSITION OF JERRY YANG DARUI, TAKEN ON **MAY 29, 2019**  
(Page and Line Numbers)

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
8:4-9			
9:5-7			
14:22-15:11			
22:9-23:9			
24:15-25:7			
55:2-22			
57:16-58:9			
60:13-64:1			
65:7-68:2			
73:13-75:9			
78:19-79:14			
82:11-12			
84:7-23			
85:20-86:8			

DEPOSITION OF JERRY YANG DARUI, TAKEN ON **MAY 29, 2019**  
 (Page and Line Numbers)

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
87:2-22			
88:19-89:3			
93:1-9			
96:17-25			
98:13-23			
101:9-23			
109:1-110:10			
111:11-22			
116:20-117:2			
118:16-22			
119:11-14			
121:3-16			
123:20-124:11			
124:15-125:16			

**III. GOUKI GAO (People's Republic of China)**

DEPOSITION OF GOUKI GAO, TAKEN ON **MAY 30, 2019**  
 (Page and Line Numbers)

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
8:5-24			
13:2-12			
13:17-23			
14:21-17:7			

1	17:21-18:24			
2	20:1-23:25			
3	25:1-21			
4	27:2-4			
5	27:8-29:10			
6	30:7-24			
7	33:1-8			
8	34:13-22			
9	35:20-36:25			
10	37:9-38:6			
11	39:11-40:4			
12	42:4-44:22			
13	46:4-48:15			
14	55:20-56:15			
15	57:3-20			
16	59:3-62:24			
17	64:12-66:3			
18	66:9-67:5			
19	67:21-74:4			
20	77:15-22			
21	79:8-80:8			
22	102:11-24			
23	104:22-105:17			
24	106:2-6			
25	109:10-110:4			
26	111:10-112:22			
27				
28				

113:8-114:12			
117:22-125:15			
130:19-22			

#### IV. ERIC PANG (Singapore)

DEPOSITION OF ERIC PANG, TAKEN ON MAY 31, 2019  
(Page and Line Numbers)

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
8:11-14			
15:23-16:9			
16:13-20			
18:12-15			
22:3-24:25			
27:9-29:6			
29:13-30:12			
31:20-32:10			
42:18- 43:24			
44:6-17			
47:4-48:23			
49:5-8			
51:2-53:4			
56:15-18			
59:8-17			
60:21-25			
63:24-64:4			

DEPOSITION OF ERIC PANG, TAKEN ON **MAY 31, 2019**

(Page and Line Numbers)

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
67:3-68:7			
75:25-76:11			
77:6-79:9			
79:15-17			
80:2-3			
80:6-20			
81:12-24			
82:15-18			
85:22-24			
86:23-87:25			
88:24-89:10			
95:5-97:12			
101:17-102:7			
105:1-17			
105:18-106:14			
107:19-108:10			
109:13-110:10			
110:22-111:21			
114:21-115:18			
120:11-24			
121:2-17			
123:5-11			
123:19-25			

DEPOSITION OF ERIC PANG, TAKEN ON **MAY 31, 2019**

(Page and Line Numbers)

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
124:14-125:16			

**V. BRYAN LIM** (Singapore)DEPOSITION OF BRYAN LIM, TAKEN ON **APRIL 5, 2019**

(Page and Line Numbers)

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
8:10-9:13			
10:18-11:7			
15:8-15:11			
22:7-9			
32:5-17			
33:8-11			
34:18-21			
35:3-25			
36:1-37:9			
37:10-38:12			
39:3-39:16			
41:7-42:1			
51:20-53:14			
53:11-53:22			
53:23-54:11			
55:18-55:21			
60:25-61:10			



DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 5, 2019*(Page and Line Numbers)*

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
64:24-67:19			
68:9-18			
85:18-86:4			
88:24-90:12			
103:1-8			
103:14-104:2			
106:18-23			
140:6-12			
160:9-20			
165:24-168:13			
180:6-12			

VI. DEQIANG LIU (People's Republic of China)

DEPOSITION OF DEQIANG LIU, TAKEN ON NOVEMBER 1, 2019  
(Page and Line Numbers)

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
8:22-9:11			
17:19-21			
19:1-23:24			
21:15-22:14			
22:15-23:20			
24:19-26:3			
38:2-15			
38:16-39:12			
43:15-44:6			
47:2-5			
48:15-50:6			
51:11-52:25			
54:18-64:20			
63:7-64:12			
66:2-67:14			
67:1-5			
75:11-15			
81:1-83:4			
87:5-88:18			
91:4-22			
95:14-96:5			
109:1-114:25			

DEPOSITION OF DEQIANG LIU, TAKEN ON NOVEMBER 1, 2019*(Page and Line Numbers)*

PLAINTIFF'S DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	DEFENDANTS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
119:1-125:24			
125:22-129:25			
130:6-146:25			
151:1-155:15			
156:20-157:25			
160:15-162:1			

Dated: October 1, 2021

Respectfully submitted,

ROPERS MAJESKI PC

By: /s/ Lael Andara

LAEL D. ANDARA

*Attorney for Plaintiff*

SINCO TECHNOLOGIES PTE LTD